## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY III LLC, et al.,	§	Case No. 20-33948 (MI)
	§	, , ,
	§	(Jointly Administered)
Post-Effective Date Debtors. <sup>1</sup>	§	` '

## CERTIFICATE OF NO OBJECTION TO PLAN ADMINISTRATOR'S TENTH OMNIBUS OBJECTION SEEKING TO RECLASSIFY CERTAIN CLAIMS (IMPROPERLY CLASSIFIED CLAIMS)

(Related Docket No. 2424)

The undersigned hereby certifies as follows:

- 1. On March 30, 2022, the *Plan Administrator's Tenth Omnibus Objection Seeking to Reclassify Certain Claims (Improperly Classified Claims)* [Docket No. 2424] (the "Omnibus Objection") was filed with the Court by the administrator of the chapter 11 plan of the above-captioned post-effective date debtors.
- 2. Responses, if any, to the Omnibus Objection were required to have been filed with the Court on or before April 29, 2022 (the "Response Deadline").

<sup>&</sup>lt;sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

3. The Response Deadline has passed and no responsive pleading to the Omnibus Objection has appeared on the Court's docket in the above-captioned chapter 11 cases or was served upon the undersigned counsel. Accordingly, the undersigned respectfully requests that the form of Order granting the Omnibus Objection attached hereto as **Exhibit A** be entered at the earliest convenience of the Court.

Dated: May 4, 2022 Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner, Esq. (TX Bar No. 00792304)

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Counsel for the Plan Administrator

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of May, 2022, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner
Michael D. Warner, Esq.